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23 UNITED STATES DISTRICT COURT  
24 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
25 SAN FRANCISCO DIVISION

26 AMERICAN FEDERATION OF  
27 GOVERNMENT EMPLOYEES, AFL-CIO, et  
28 al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity  
as President of the United States, et al.,

Defendants.

Case No. 3:25-cv-03698-SI

**DECLARATION OF YVETTE WILSON**

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I, Yvette Wilson, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. On April 19, 2025, I retired from my job as a Claims Specialist in the Social Security Administration (“SSA”), Western Program Service Center, where I had worked for approximately 43 years.

3. The SSA’s mission is to provide financial protection for Americans through retirement, disability, and survivor’s benefits. These benefits are administered through a network of approximately 1,230 field offices across the country, which are supported by ten regional offices and six program service centers.

4. I am the President of the American Federation of Government Employees, Local 1122 (“Local 1122” or the “Union”). I have been a member of the Union for my entire career as a federal employee. I have served as the President of Local 1122 for approximately ten years. In total, I have served as a steward or officer of Local 1122 for approximately 40 years.

5. Local 1122 is affiliated with AFGE Council 109 (“C109”).

6. Local 1122 represents a bargaining unit of approximately 600 professional and nonprofessional employees at the SSA Western Program Service Center in Richmond, California, in addition to other units from SSA’s San Francisco, Denver, and Seattle regions. This unit includes positions from Claims Specialists and Benefits Authorizers to Mail Room workers and other clerical staff. Program Service Center employees are highly skilled and perform the critical and diverse functions to maintain the country’s social insurance and anti-poverty program. Local 1122’s bargaining unit employees perform sensitive, technically complex work to determine the exact type and amounts of benefit payments that are allocated to each recipient. Benefits Authorizers ensure that the benefits each recipient receives are adjusted over time to account for over/underpayments, changing levels of disability, and major life events including retirement, inheritance, major medical events, and deaths. Their dedication and experience in these roles ensure that the provision of Social Security benefits match the real situations of their recipients.

1 These roles are essential to addressing the problems of fraud, mismanagement, and administrative  
2 mistakes that have the potential to harm tens of millions of Americans.

3 7. AFGE Local 1122's bargaining unit employees report to the SSA Western Program  
4 Service Center in Contra Costa County.

5 8. AFGE Local 1122 currently has approximately 394 members, with membership  
6 being voluntary and available to all bargaining unit employees represented by Local 1122.

7 9. AFGE Local 1122's operations are funded through voluntary dues paid by  
8 members.

9 10. AFGE Local 1122's mission is to advocate for the rights, safety, and fair treatment  
10 of its bargaining unit employees. As the exclusive bargaining representative of these workers, the  
11 Union provides many services to all bargaining unit employees, not just its members. Core  
12 functions of the Union include collective bargaining with the agency to obtain a fair and  
13 reasonable collective bargaining agreement ("CBA"); filing and negotiating grievances, including  
14 health and safety complaints, against the agency to enforce the terms and conditions of the CBA;  
15 pursuing arbitrations on behalf of workers to enforce the CBA; and providing other support,  
16 guidance, and resources to bargaining unit employees.

17 11. Local 1122 bargaining unit employees are under tremendous pressure to leave  
18 SSA. Many feel coerced or intimidated to opt into the deferred resignation program or otherwise  
19 "voluntarily" separate from the agency.

20 12. This coordinated campaign to pressure employees to separate from the agency has  
21 led to staffing shortages at an already understaffed agency. Staffing shortages are harmful not only  
22 to the agency's ability to perform for the American people, but for the employees on site at the  
23 agency, as well. The agency's underfunding of field offices also impacts employees' health. Two  
24 federal employees at the Richmond Payment Center died of Legionnaire's Disease several years  
25 ago after the Agency's premises falling into dangerous disrepair. Just recently, fecal matter fell  
26 from the pipes at the Center onto employees' desks. With fewer employees left to manage SSA  
27 facilities, these hazards will only become more dangerous. These dangerous conditions and the  
28 stress and anxiety from the anticipated increase in workload after the announcement that Agency

1 staff will decrease by 7,000 employees are pushing Local 1122 employees out of federal service,  
2 as well.

3 13. I am aware of layoffs that have currently affected facilities and Human Resources  
4 employees at the SSA Western Program Service Center, including staff members who are  
5 responsible for payroll management and testing our water for Legionnaire's Disease. The loss of  
6 these workers has put even more pressure on Local 1122 employees to separate from the agency  
7 out of fear of potentially lethal working conditions.

8 14. I am also aware that employees at other SSA Field Offices and Program Service  
9 Centers which have been affected by Legionnaire's Disease in the past are afraid that these life-  
10 threatening conditions will return if staff is cut any further.

11 15. The exodus of Local 1122 bargaining unit employees is affecting Americans'  
12 access to services. Wait times for appointments have increased, a delay that terminally ill  
13 Americans simply cannot afford. I worked at the Western Program Service Center during the three  
14 prior government shutdowns in December 1995-January 1996, October 2013, and December  
15 2018-January 2019, and during those shutdowns, SSA employees continued to work and process  
16 applications despite being threatened with the loss of pay. Here, with the mass exodus of Local  
17 1122 bargaining unit employees, we already are processing applications at rates worse than during  
18 those prior shutdowns. There is no precedent for how long an application could take to process  
19 after 7,000 employees are removed from the SSA.

20 16. SSA's "3-Month Action Plan" and its ongoing, concerted effort to push employees  
21 to voluntarily separate from the agency, have caused significant fear and concern among Local  
22 1122's members and leadership. In addition to the dangerous working conditions suffered by  
23 several bargaining unit employees, many more have relocated their lives and families to accept  
24 positions with SSA and fear that they will soon be unemployed, without a functioning safety net  
25 that they once helped to administer. They and their families will lose health insurance coverage.

26 17. In response to these developments, Local 1122 has been forced to devote  
27 substantial resources to assisting our bargaining unit employees and providing guidance about  
28 retirement, benefits, separation from federal service, and RIFs. Local 1122 leaders have devoted

1 their time, energy, and resources to this overwhelming demand, diverting critical resources from  
2 other Union priorities.

3 18. Local 1122 is preparing for a significant reduction to the size of our unit and the  
4 financial and operational harm that reduction will cause.

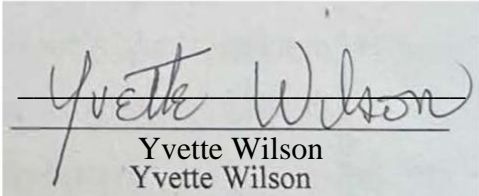
5 19. The removal of Local 1122 bargaining unit employees from federal employment  
6 will significantly weaken the Union's bargaining power, as our bargaining strength is directly tied  
7 to the number of employees we represent.

8 20. Local 1122 will likely lose hundreds of members if SSA effectuates its "3-Month  
9 Action Plan." This loss will have a direct impact on the Union's financial stability and its ability to  
10 provide essential services to both members and affiliates.

11 21. The implementation of the "3-Month Action Plan," and any implied RIFs  
12 undertaken to accomplish it, will have severe consequences for Local 1122's ability to perform its  
13 core functions. Americans will experience lengthy processing times, tantamount to a benefit cut.  
14 SSA's technological infrastructure will be at risk. Participation in the Supplemental Security  
15 Income program will decrease if field offices close and Americans living in poverty are unable to  
16 travel for hearings, and the Western Program Service Center will be unable to effectively process  
17 the huge volume of diverse and sensitive information it collects from residents of Contra Costa  
18 County seeking social security benefits if employees are separated. The loss of Local 1122  
19 bargaining unit employees will devastate not only the Union's ability to protect safety, fairness,  
20 and dignity in the workplace, but the SSA's ability to provide benefits for all Americans—  
21 especially the most vulnerable.

22 I declare under penalty of perjury under the laws of the United States that the foregoing is  
23 true and correct. Executed April 28, 2025, in Richmond, CA.

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Yvette Wilson  
Yvette Wilson